

ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

On June 8, 2019, at approximately 12:15 a.m., the Defendant, **HENRY LEE KENNER, II** (“**KENNER**”), dressed in black, drove from Virginia to the home of the Victim in Prince Frederick, Maryland. **KENNER** went to the Victim’s residence and asked to speak with the Victim. An argument ensued and **KENNER** struck the Victim with his fist and cut her hand with a knife, resulting in serious bodily injury. **KENNER** forcibly, and without consent, removed the Victim from the home. **KENNER**, while continuing to assault her, took the Victim to his car and sat her in the passenger seat. A witness who observed portions of these events stated that she heard **KENNER** threaten that he would kill the Victim if she opened the door when **KENNER** was walking around the car to the driver’s seat.

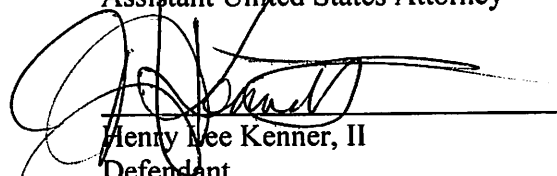
KENNER then drove the vehicle from Calvert County through Charles and Prince George’s Counties, Maryland, and into Virginia. While in route, **KENNER** yelled at the Victim and assaulted her. At one point, while still in Maryland, an officer from the Maryland State Police called **KENNER** on his cellular phone and asked that he return with the Victim to the Victim’s residence. **KENNER** indicated that he would do so, but he did not. Instead, **KENNER** continued across the state line, into Virginia. **KENNER** then pulled over and disposed of the knife, before eventually dropping off the Victim at a hospital where she was treated for her injuries. **KENNER** ultimately turned himself in to the Maryland State Police.

In October of 2019, **KENNER** was charged in the District of Maryland with Kidnapping, in violation of 18 U.S.C. § 1201(a)(1). During December of 2019, **KENNER** was in federal custody in Washington, D.C. awaiting trial on the Maryland Kidnapping charge. During this time, **KENNER** attempted to persuade an individual, by the offering of money, to arrange for the killing of the Victim in this case so that the Victim would be unable to testify against **KENNER**. In furtherance of this plan, **KENNER** provided the Victim’s personal identifying information to the individual, with the expectation that it would be used to locate and kill the victim. The other individual did not execute the plan and no money changed hands.


SO STIPULATED:

/s/

G. Michael Morgan, Jr.
Assistant United States Attorney



Henry Lee Kenner, II
Defendant



Elizabeth Oyer, Esq. / B. Gordon Hurr
Counsel for Defendant